

REC'D IN PRO SE OFFICE  
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IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK

Konate Lilas,

*(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)*

**-against-**

Roosevelt Union Free School District, Michele P. Van Eyken, ~~former Deputy Superintendent of Roosevelt Union Free School District~~, and Deborah Wortham, former Superintendent of Roosevelt Union Free School District,

*(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)*

**Complaint for Employment  
Discrimination**

Case No.

**CV 24 8857**

*(to be filled in by the Clerk's Office)*

Jury Trial:

☒ Yes ☐ No

*(check one)*

**CHOUDHURY, J.**

**DUNST, M.J.**

**\*\*Filed\*\***

December 27, 2024 via Brooklyn Office

U.S. District Court

Eastern District of New York

RECEIVED

January 2, 2025

EDNY CI PRO SE OFFICE

**I. The Parties to This Complaint****A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	<u>Konate Lilas</u>
Street Address	<u>240 E. 93rd Street, Apt. 9C</u>
City and County	<u>New York, New York County</u>
State and Zip Code	<u>NY 10128</u>
Telephone Number	<u>(917) 838-6090</u>
E-mail Address	<u>Dangereducatedblackman2002@yahoo.com</u>

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

**Defendant No. 1**

Name	<u>Roosevelt Union Free School District</u>
Job or Title (if known)	<u></u>
Street Address	<u>1 Wagner Avenue</u>
City and County	<u>Roosevelt, Nassau County</u>
State and Zip Code	<u>NY 11575</u>
Telephone Number	<u>(516) 345-7001</u>
E-mail Address (if known)	<u></u>

**Defendant No. 2**

Name	<u>Michel P. Van Eyken, Assistant Superintendent of Data</u>
Job or Title (if known)	<u>Assessment, Attendance and Registration</u>
Street Address	<u>1 Wagner Avenue</u>
City and County	<u>Roosevelt, Nassau County</u>

Defendants Continued:

c. Defendant No. 3

Name Deborah Wortham

Job or Title former Superintendent of Roosevelt Union Free School District  
(if known)

Street Address 801 Key Highway Unit 235

City and County Baltimore

State and Zip Code MD 21230

Telephone Number \_\_\_\_\_

E-mail Address \_\_\_\_\_

(if known)

State and Zip Code	<u>NY 11575</u>
Telephone Number	<u>(516) 345-7001</u>
E-mail Address (if known)	<u></u>

**C. Place of Employment**

The address at which I sought employment or was employed by the defendant(s) is:

Name	<u>Roosevelt Union Free School District</u>
Street Address	<u>1 Wagner Avenue</u>
City and County	<u>Roosevelt, Nassau County</u>
State and Zip Code	<u>NY 11575</u>
Telephone Number	<u>(516) 345-7001</u>

**II. Basis for Jurisdiction**

This action is brought for discrimination in employment pursuant to *(check all that apply)*:

- ☒ Title VII of the Civil Rights Act of 1964, as codified, 42 U.S.C. §§ 2000e to 2000e-17 (race, color, gender, religion, national origin).

*(Note: In order to bring suit in federal district court under Title VII, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)*

- ☐ Age Discrimination in Employment Act of 1967, as codified, 29 U.S.C. §§ 621 to 634.

*(Note: In order to bring suit in federal district court under the Age Discrimination in Employment Act, you must first file a charge with the Equal Employment Opportunity Commission.)*

- ☐ Americans with Disabilities Act of 1990, as codified, 42 U.S.C. §§ 12112 to 12117.

*(Note: In order to bring suit in federal district court under the Americans with Disabilities Act, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)*

☐ Other federal law (*specify the federal law*):

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☒ Relevant state law (*specify, if known*):  
New York State Human Rights Law

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☐ Relevant city or county law (*specify, if known*):

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### III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

A. The discriminatory conduct of which I complain in this action includes (*check all that apply*):

- ☐ Failure to hire me.
- ☐ Termination of my employment.
- ☐ Failure to promote me.
- ☐ Failure to accommodate my disability.
- ☒ Unequal terms and conditions of my employment.
- ☒ Retaliation.
- ☐ Other acts (*specify*): \_\_\_\_\_

*(Note: Only those grounds raised in the charge filed with the Equal Employment Opportunity Commission can be considered by the federal district court under the federal employment discrimination statutes.)*

B. It is my best recollection that the alleged discriminatory acts occurred on date(s)  
Please see attached addendum.

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**C. I believe that defendant(s) (check one):**

- ☒ is/are still committing these acts against me.
- ☐ is/are not still committing these acts against me.

**D. Defendant(s) discriminated against me based on my (check all that apply and explain):**

- ☒ race Black
- ☐ color \_\_\_\_\_
- ☐ gender/sex \_\_\_\_\_
- ☐ religion \_\_\_\_\_
- ☐ national origin \_\_\_\_\_
- ☐ age. My year of birth is \_\_\_\_\_. *(Give your year of birth only if you are asserting a claim of age discrimination.)*
- ☐ disability or perceived disability *(specify disability)*

**E. The facts of my case are as follows. Attach additional pages if needed.**

**Please see attached addendum.**

***(Note: As additional support for the facts of your claim, you may attach to this complaint a copy of your charge filed with the Equal Employment Opportunity Commission, or the charge filed with the relevant state or city human rights division.)***

**IV. Exhaustion of Federal Administrative Remedies**

- A. It is my best recollection that I filed a charge with the Equal Employment Opportunity Commission or my Equal Employment Opportunity counselor regarding the defendant's alleged discriminatory conduct on *(date)*

On or about August 21, 2023

- B. The Equal Employment Opportunity Commission *(check one)*:

- ☐ has not issued a Notice of Right to Sue letter.  
☒ issued a Notice of Right to Sue letter, which I received on *(date)*  
On or about October 4, 2024

*(Note: Attach a copy of the Notice of Right to Sue letter from the Equal Employment Opportunity Commission to this complaint.)*

- C. Only litigants alleging age discrimination must answer this question.

Since filing my charge of age discrimination with the Equal Employment Opportunity Commission regarding the defendant's alleged discriminatory conduct *(check one)*:

- ☐ 60 days or more have elapsed.  
☐ less than 60 days have elapsed.

**V. Relief**

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

The Roosevelt Union Free School District has severely damaged my good name and image as a New York State certified teacher. They have brought charges against me and prevented me from per session opportunities resulting in a loss of income. I want to be compensated for the damage to my reputation, loss in income and emotional distress damages.

## VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

### A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: December 27, 2024

Signature of Plaintiff

Printed Name of Plaintiff

Korata Lila  
Korata Lila

**Federal Complaint Addendum for Konate Lilas @ 12/23/24**

1. I have been employed as a tenured social studies teacher at both the Roosevelt High School and the Middle School for the Roosevelt Union Free School District since September 2004.
2. I am of black race.
3. The District reassigned me from the classroom to the District's central office on February 7, 2020, pending the results of an "investigation". The District's involuntary reassignment from my duties prevented me from receiving compensation for per session, summer school, and sixth period teaching opportunities, in which teachers are paid an additional 20% of their annual gross income.
4. In approximately February 2020, the School District's counsel, Guercio & Guercio, pressured me to speak out against another teacher in the District, who has a pending racial discrimination lawsuit against the District. I had been identified as a relevant witness by both the District as well as my colleague. Upon my initial refusal, the District's counsel played a recording my colleague secretly took of me, in which I was jokingly speaking to him in a disparaging manner. After listening to the recording, I still refused to cooperate with the District. I informed the District's counsel that I was not particularly motivated to help the District in its pursuit against my colleague, because I myself could very likely be facing legal action at the hands of the District as well. I opined at what I felt was the audacity of the District to ask me to help the very same people who are not only looking to terminate my employment but possibly have my teaching license revoked. The District's attorney told me that if I helped the District

against my colleague, my current legal issues with the District would be taken under serious consideration. I however still refused to cooperate.

5. After I refused to cooperate with the District against my colleague, the District served me with Section 3020-a charges seeking termination of my employment from the District in September 2020 signed by Michele P. Van Eyken, the District's then Deputy Superintendent. The charges included misconduct, sexual misconduct, grooming of middle school girls, and other salacious charges. I was then served additional 3020-a charges in November 2020, falsely accusing me of exposing minors to pornographic images and other charges related to lesson plans signed by then Superintendent Deborah Wortham.
6. In July 2020, I was informed by my union president that the disciplinary charges were unfounded and I was given an official letter by the District's then Deputy Superintendent Michele P. Van Eyken requesting that I report back to Roosevelt High School.
7. In late August 2020, I attended a Superintendent's conference via zoom with the entire faculty. At the zoom meeting, I publicly questioned the suitability of an Asian woman conducting a Black Lives Matter event. She, along with other staff members, were visibly upset with my line of questioning during the zoom meeting.
8. Hours after the meeting, I was informed by the Director of Personnel that the allegations that were just a few days ago resolved and unsubstantiated by the District, were now being reinvestigated. There were no new developments with regards to the case from the time the charges against me were unfounded to me being recharged again. Shortly thereafter, I was then served Section 3020-a charges in September 2020. I was

then reassigned to the home, which continued to preclude me from receiving compensation for per session opportunities, summer school, and sixth teaching period work.

9. After more than three years of being removed from the classroom, my Section 3020-a charges were finally adjudicated before a 3020-a hearing officer, in a decision issued on February 27, 2023. The hearing officer assessed a minor \$3,500 fine, dismissed all of the most salacious charges, and only sustained disciplinary charges of failure to submit lesson plans in a timely fashion and not completing the setting up Google Classroom.
10. The District however unlawfully refused to return me to the classroom after the Section 3020-a February 2023 decision, within 15 days of its issuance. The District also refused to give me access to my email account, which was necessary for me to apply for per session overtime opportunities. Instead, the District ordered me to an involuntary psychological examination, even though there were no new developments regarding my situation dating back to February 2020. My psychological evaluation was scheduled for June 7, 2023, before Dr. Randall Solomon.
11. On June 7, 2023, I attended the psychological examination before District-selected psychologist Dr. Solomon. On July 7, 2023, I received Dr. Solomon's report, dated June 28, 2023, which was very unfavorable. Any administrator present or future would have access to these unfavorable results, and could use them in determining if I am suitable for any future administrative employment opportunities in which I have the appropriate New York State Licenses for. Dr. Solomon suggested that I attend six counseling sessions with a licensed clinician before I can be deemed psychologically

fit to teach. The District adopted his recommendation and mandated that I complete the counseling sessions in order to return to the classroom and be fully reinstated with email access. I was then sent to another medical examination by Dr. Solomon following the counseling sessions, and was eventually cleared.

12. The District eventually reassigned me to teach students in April 2024. However, the District's failure to restore me to the classroom, and have me reassigned to my home for almost four years, caused me considerable economic loss. These losses include lost back pay for summer school, per session opportunities, teaching six periods (which constitutes additional compensation loss of 20 percent of my teaching salary), and central office administrator opportunities. The District also unlawfully disabled my email access from the fall of 2020 until April 2024, even after I was no longer under investigation and a New York State Section 3020-a hearing officer decision had authorized me to return to the classroom. This prevents me from applying to any per session opportunities. The District also continues to bar me from returning to school grounds, even though my 3020-a proceeding has concluded. This prevents me from even attending any per session opportunities.

13. The District's false and outrageous formal disciplinary charges against me have also defamed my good name and character. False sexual misconduct allegations towards minors, in addition to a psychological examination, likely will prevent me from future administrative and teaching income earning opportunities from the Roosevelt Union Free School District as well as other Districts.

14. Based on racial discrimination and retaliation, I seek monetary damages, for emotional distress, defamatory injury to my reputation, loss of per session opportunities, loss of

sixth period compensable teaching opportunities, loss of central office administrative opportunities, and a hostile work environment.

15. I filed an SDHR complaint, dually filed with the EEOC, on or about August 18, 2023, administratively withdrew it, and I received an EEOC right to sue letter dated October 2, 2024.



## U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

New York District Office  
33 Whitehall St, 5th Floor  
New York, NY 10004  
(929) 506-5270  
Website: [www.eeoc.gov](http://www.eeoc.gov)

### **DETERMINATION AND NOTICE OF RIGHTS**

(This Notice replaces EEOC FORMS 161, 161-A & 161-B)

Issued On: 10/02/2024

To: Konate Lilas  
240 East 93rd Street  
Apt 9C  
New York, NY 10028

Charge No: 16G-2023-05557

EEOC Representative and email: HERNAN MORALES  
State and Local Program Manager  
HERNAN.MORALES@EEOC.GOV

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### **DETERMINATION OF CHARGE**

The EEOC issues the following determination: The EEOC will not proceed further with its investigation and makes no determination about whether further investigation would establish violations of the statute. This does not mean the claims have no merit. This determination does not certify that the respondent is in compliance with the statutes. The EEOC makes no finding as to the merits of any other issues that might be construed as having been raised by this charge.

The EEOC has adopted the findings of the state or local fair employment practices agency that investigated your charge.

### **NOTICE OF YOUR RIGHT TO SUE**

This is official notice from the EEOC of the dismissal of your charge and of your right to sue. If you choose to file a lawsuit against the respondent(s) on this charge under federal law in federal or state court, your lawsuit must be filed **WITHIN 90 DAYS** of your receipt of this notice. Receipt generally occurs on the date that you (or your representative) view this document. You should keep a record of the date you received this notice. Your right to sue based on this charge will be lost if you do not file a lawsuit in court within 90 days. (The time limit for filing a lawsuit based on a claim under state law may be different.)

If you file suit, based on this charge, please send a copy of your court complaint to this office.

On behalf of the Commission,

Digitally Signed By: Yaw Gyebi, Jr.  
10/02/2024

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Yaw Gyebi, Jr.  
District Director

**Cc: Roosevelt Union Free School District  
Attn: Superintendent of Schools  
240 Denton Place  
Roosevelt NY 11575**

**Please retain this notice for your records.**

## New York State Division of Human Rights Employment Complaint Form

Although workers, interns and volunteers of all ages are protected, you must be 18 years or older to file a complaint. A parent, guardian or other person having legal authority to act in the minor's interests must file on behalf of a person under the age of 18.

### 1. Your contact information:

First Name <u>Konate</u>		Middle Initial/Name	
Last Name <u>Lilas</u>			
Street Address/ PO Box <u>240 E. 93rd Street</u>		Apt or Floor #: <u>9C</u>	
City <u>New York</u>		State <u>NY</u>	Zip Code <u>10028</u>
If you are filing on behalf of another, provide the name of that person:	Date of birth:	Relationship:	

### 2. Regulated Areas: Check the area where the discrimination occurred:

(If you wish to file against multiple entities, for example employer and temp agency, please file a separate complaint against each.)

- |  |   |
|--|---|
| <input checked="" type="checkbox"/> Employment (including paid internship)<br><input type="checkbox"/> Internship (unpaid)<br><input type="checkbox"/> Contract Work (independent contractor, or work for a contractor)<br><input type="checkbox"/> Volunteer Position | <input type="checkbox"/> by a Labor Organization<br><input type="checkbox"/> Apprentice Training<br><input type="checkbox"/> by a Temp or Employment Agency<br><input type="checkbox"/> Licensing |
|--|---|

### 3. You are filing a complaint against:

Employer, Worksite, Agency or Union Name <u>Roosevelt Union Free School District</u>		
Street Address/ PO Box <u>240 Denton Place</u>		
City <u>Roosevelt</u>	State <u>NY</u>	Zip Code <u>11575</u>
Telephone Number: <u>(516) 345-7001</u>		
In what county or borough did the violation take place? <u>Nassau County</u>		
Individual people who discriminated against you:		
Name: <u>Eva Denyon</u>	Title: <u>Former Superintendent</u>	
Name: <u>Debra Wortham</u>	Title: <u>Superintendent</u>	
If you need more space, please list them on a separate piece of paper.		

### 4. Date of alleged discrimination (must be within one year of filing):

The most recent act of discrimination happened on: 6 7 2023  
month day year

### 5. For employment and internships, how many employees does this company have?

- ☐ 1-14
 ☐ 15-19
 ☒ 20 or more
 ☐ Don't know



8. Acts of alleged discrimination: What did the person/company you are complaining against do? Check all that apply			
<input type="checkbox"/> Refused to hire me	<input checked="" type="checkbox"/> Gave me a disciplinary notice or negative performance review	<input type="checkbox"/> Denied my request for an accommodation for my disability, or pregnancy-related condition	<input type="checkbox"/> Sexual harassment
<input type="checkbox"/> Fired me/laid me off	<input type="checkbox"/> Suspended me	<input type="checkbox"/> Denied me an accommodation for domestic violence	<input checked="" type="checkbox"/> Harassed or intimidated me on any basis indicated above
<input type="checkbox"/> Demoted me	<input type="checkbox"/> Did not call back after lay-off	<input type="checkbox"/> Denied me an accommodation for my religious practices	<input type="checkbox"/> Denied services or treated differently by a temp or employment agency
<input type="checkbox"/> Denied me promotion/ pay raise	<input type="checkbox"/> Paid me a lower salary than other co-workers doing the same job	<input checked="" type="checkbox"/> Denied me leave time or other benefits	<input type="checkbox"/> Denied a license by a licensing agency
<input type="checkbox"/> Denied me training	<input type="checkbox"/> Gave me different or worse job duties than other workers doing the same job	<input type="checkbox"/> Discriminatory advertisement or inquiry or job application	<input checked="" type="checkbox"/> Other: Sent to involuntary psychological examination.

**9. Description of alleged discrimination**

***Tell us more about each act of discrimination that you experienced. Please include dates, names of people involved, and explain why you think it was discriminatory. TYPE OR PRINT CLEARLY.***

Please see attached addendum.

Additional Witness:

Seymore Jackson, Roosevelt Union President  
(516) 314-9893

She can testify about my eligibility for 6th period compensation.

***If you need more space to write, please continue writing on a separate sheet of paper and attach it to the complaint form. DO NOT WRITE IN THE MARGINS OR ON THE BACK OF THIS FORM.***

### Signature (Declaration or Oath)

Based on the information contained in this form, I charge the herein named respondent(s) with an unlawful discriminatory practice, in violation of the New York State Human Rights Law.

By filing this complaint, I understand that I am also filing my employment complaint with the United States Equal Employment Opportunity Commission under the Americans With Disabilities Act (covers disability related to employment), Title VII of the Civil Rights Act of 1964, as amended (covers race, color, religion, national origin, sex relating to employment), and/or the Age Discrimination in Employment Act, as amended (covers ages 40 years of age or older in employment). This complaint will protect my rights under federal law.

I hereby authorize the New York State Division of Human Rights to accept this complaint on behalf of the U.S. Equal Employment Opportunity Commission, subject to the statutory limitations contained in the aforementioned law.

I have not filed any other civil action, nor do I have an action pending before any administrative agency, under any state or local law, based upon this same unlawful discriminatory practice. (If you have another action pending and still wish to file, please contact our office to discuss.)

PLEASE INITIAL KL

Human Rights Law § 297.1 requires that a complaint filed with the Division of Human Rights must be "under oath or by declaration." You must complete either the "declaration" or "oath" sections below. The declaration requires only your signature and does not need to be notarized. The oath requires that you sign it before a notary.

#### DECLARATION

I affirm this 10<sup>th</sup> day of August (month), 2023 (year) at New York (city), NY (state), under penalties of perjury, that I am the complainant herein; that I have read (or had read to me) the foregoing complaint and know the content thereof; that the same is true of my own knowledge except as to the matters therein stated on information and belief; and that as to those matters, I believe the same to be true.

Konate Litas  
[Complainant name]

#### OATH

STATE OF NEW YORK )  
COUNTY OF New York ) SS:

KONATE LITAS, being duly sworn, deposes and says: that I am the complainant herein; that I have read (or had read to me) the foregoing complaint and knows the content thereof; that the same is true of my own knowledge except as to the matters therein stated on information and belief; and that as to those matters, I believes the same to be true.

Konate Litas  
Complainant signature

Subscribed and sworn to  
before me this 10<sup>th</sup> day  
of August, 2023

Signature of Notary Public

BRYAN GLASS  
NOTARY PUBLIC, STATE OF NEW YORK  
Registration No. 02GL6068978  
Qualified in Rockland County  
Commission Expires January 22, 2026

Please note: Once this form is completed and returned to the New York State Division of Human Rights, it becomes a legal document and an official complaint with the Division.

**Additional Information, Page 1: This page is for the Division's records and will not be sent to the company or person(s) whom you are filing against.**

**1. Contact information**

**My primary telephone number:** (917) 838 - 6090

**My secondary telephone number:**

**My date of birth:** 5/28/73

**(Required) My email address:** dangereducatedblackman2003@yahoo.com

*The Division uses email, whenever possible, to communicate with the parties to complaints. This avoids delays and lost mail, and increases the efficiency of Division case processing. Therefore, you are required to provide an email address, if you have one, and to keep us advised of any change of your email address. The Division will not use your email address for any non-case related matters.*

**Contact person (Someone who does not live with you but will know how to contact you if we cannot reach you)**

**Contact person's name:** Marilyn Lilas

**Contact person's telephone number:** (917) 929-6344

**Contact person's address**

**Contact person's email address:** s98mrd@aol.com

**Contact person's relationship to me:** Spouse

**2. Special needs: I am in need of:**

- ☐ Interpretation (if so what language?): \_\_\_\_\_
- ☐ Accommodations for a disability: \_\_\_\_\_
- ☐ Privacy. Keep my contact information confidential as I am a victim of domestic violence
- ☐ Other: \_\_\_\_\_

**3. Settlement / Conciliation: To settle this complaint, I would accept:**

*(Explain what you want to happen as a result of this complaint. Do you want a letter of apology, job offer, return to the job, an end to the harassment, compensation, etc.?)*

Monetary damages for emotional distress, lost per session for 6th period and summer school, and attorneys' fees.

**4. Witnesses (information about witnesses may be shared with the parties as necessary for the investigation) The following people saw or heard the discrimination and can act as witnesses:**

**Name:** Douglas White

**Telephone Number:** (516) 574-3360

**What did this person witness?**

**Knowledge of retaliation against me.**

**Title:** Teacher

**Relationship to me:** Colleague

**Name:** Danara Nesbit

**Telephone Number:** (717) 997-1216

**What did this person witness?**

**Title:** Teacher/ Colleague

**Relationship to me:** Bldg Rep.

**Knowledge of involuntary psychological examination and witness at disciplinary meetings including 2/27/20.**

**Additional Information, Page Two**

**5. Did you report or complain about the discrimination to someone else?** ☐ Yes ☒ No

**If yes, how exactly did you complain about the discrimination? (To whom did you complain?)**

**Date you reported or complained about discrimination:**

\_\_\_\_\_  
month

\_\_\_\_\_  
day

\_\_\_\_\_  
year

**What happened after you complained?**

**If you did not report the discrimination, please explain why:**

**6. Were other people treated the same as you? How?**

*(For example, people who were harassed by the same manager, disciplined or terminated for the same reasons, did not receive an accommodation for the same reasons, etc.).*

*If you are complaining about discrimination relating to race, national origin, age, religion, etc. please describe their races, national origins, religions, etc.*

Doug White spoke up against discrimination.

**7. Were other people treated better than you? How?**

*(For example, people who were not fired for doing the same thing you were fired for, people who were doing the same job but making more money, etc.).*

*If you are complaining about discrimination relating to race, national origin, age, religion, etc. please describe their races, national origins, religions, etc.*

**NYSDHR addendum for Konate Lilas @ 8/17/23**

1. I am a black teacher who has been employed as a tenured social studies teacher for the Roosevelt Union Free School District since 2004.
2. The District reassigned me from the classroom to the District's central office on February 7, 2020, pending the results of an investigation. This reassignment prevented me from receiving compensation for per session, summer school, and sixth period teaching opportunities in which teachers are paid an additional 20% of their annual gross income.
3. In February 2020, the District's lawyer pressured me to speak out against another teacher, who has a pending racial discrimination lawsuit against the District. I had been identified as a relevant witness by both the District as well as my colleague. Upon my initial refusal, the District's lawyer played a recording my colleague secretly took of me, in which I was jokingly speaking to him in a disparaging manner. After listening to the recording, I still refused to cooperate with the District. I informed the lawyer that I was not particularly motivated to help the District in its pursuit against my colleague, because I myself could very likely be facing legal action at the hands of the District as well. I opined at what I felt was the audacity of the District to ask me to help the very same people who are not only looking to terminate my employment but possibly have my teaching license revoked. The District's lawyer told me that if I helped the District against my colleague, my current legal issues with the District would be taken under serious consideration. I however still refused to cooperate.

4. After I refused to cooperate with the District against my colleague, the District served me with Section 3020-a papers seeking termination of my employment from the District in September 2020. The charges included misconduct, sexual misconduct, grooming of middle school girls, and other salacious charges. I was then served additional 3020-a charges in November 2020, falsely accusing me of exposing minors to pornographic images and other charges related to lesson plans.
5. In July 2020, I was informed that the charges were unfounded and I was given an official letter by the District requesting that I report back to Roosevelt High School.
6. In late August 2020, I attended a Superintendent's conference via zoom with the entire faculty. At the zoom meeting, I publicly questioned the suitability of an Asian woman conducting a Black Lives Matter event. She along with other staff members were visibly upset with my line of questioning during the zoom meeting.
7. Hours after the meeting, I was informed by the Superintendent of Human Resources that the allegations that were just a few days ago resolved and unsubstantiated by the District, were now being reinvestigated. There were no new developments with regards to the case from the time the charges against me were unfounded to me being recharged again. Shortly thereafter, I was then served Section 3020-a charges in September 2020. I was then reassigned to the home, which continued to preclude me from receiving compensation for per session opportunities, summer school, and sixth teaching period work.
8. After more than three years of being removed from the classroom, my Section 3020-a charges were finally adjudicated before a hearing officer, in a decision issued on February 27, 2023. The hearing officer assessed a minor \$3,500 fine, dismissed all of

the most salacious charges, and only sustained disciplinary charges of failure to submit lesson plans in a timely fashion and not completing the setting up Google Classroom.

9. The District however unlawfully refused to return me to the classroom after the Section 3020-a February 2023 decision, within 15 days of its issuance. The District also has refused to give me access to my email account, which is necessary for me to apply for per session overtime opportunities. Instead, the District ordered me to an involuntary psychological examination, even though there were no new developments regarding my situation dating back to February 2020. My psychological evaluation was scheduled for June 7, 2023.
10. On June 7, 2023, I attended the psychological examination before District-selected psychologist Dr. Randall Solomon. On July 7, 2023, I received Dr. Solomon's report, dated June 28, 2023, which was very unfavorable. Any administrator present or future would have access to these unfavorable results, and could use them in determining if I am suitable for any future administrative employment opportunities in which I have the appropriate New York State Licenses for. Dr. Solomon suggested that I attend six counseling sessions with a licensed clinician before I can be deemed psychologically fit to teach. The District adopted his recommendation and has mandated that I complete the counseling sessions in order to return to the classroom and be fully reinstated with email access.
11. The District's failure to restore me to the classroom, and have me reassigned to my home for almost four years, has caused me considerable economic loss. These losses include lost back pay for summer school, per session opportunities, teaching six periods (which constitutes additional compensation loss of 20 percent of my teaching salary),

and central office administrator opportunities. The District also has unlawfully disabled my email access since the fall of 2020, which still remains disabled today, even though I am no longer under investigation and a New York State Section 3020-a hearing officer decision has authorized me to return to the classroom. This prevents me from applying to any per session opportunities. The District also continues to bar me from returning to school grounds, even though my 3020-a proceeding has concluded. This prevents me from even attending any per session opportunities.

12. The District's false and outrageous formal disciplinary charges against me have also defamed my good name and character. False sexual misconduct allegations towards minors, in addition to a psychological examination, likely will prevent me from future administrative and teaching income earning opportunities from the Roosevelt Union Free School District as well as other Districts.
13. Based on racial discrimination and retaliation, I seek monetary damages, for emotional distress, defamatory injury to my reputation, loss of per session opportunities, loss of sixth period compensable teaching opportunities, loss of central office administrative opportunities and the potential for a future hostile work environment.